

STATEMENT OF BASIS (AI No. 4198)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0119091 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Southern Natural Gas Company
Shadyside Compressor Station
Post Office Box 190
Centerville, Louisiana 70522

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: February 13, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - N/A

NPDES permit effective date: N/A

NPDES permit expiration date: N/A

C. LWDPS permit - (WP5021)

LWDPS permit effective date: May 25, 1995

LWDPS permit expiration date: May 24, 2000

D. Date Application Received: November 29, 1999

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - natural gas compressor station

Southern Natural Gas, Shadyside Compressor Station is an existing natural gas compressor station. Natural gas is received at the facility where it is then compressed, cooled, and distributed through the pipeline network.

B. FEE RATE

1. Fee Rating Facility Type: minor

2. Complexity Type: II

3. Wastewater Type: III

4. SIC code: 4922

C. LOCATION - 293 Sonat Lane, Centerville, St. Mary Parish
Latitude 29°43'30", Longitude 91°25'01"

3. OUTFALL INFORMATION

Outfall 001

This outfall was a previous stormwater outfall. In accordance with LAC 33:IX.2511, facilities with SIC code 4922 are not classified as facilities with industrial stormwater and stormwater coverage is not required. Furthermore, DMR's for the facility indicated there were no excursions for this outfall in the last two years. Therefore, this outfall is being removed from the permit.

Outfall 101

Discharge Type: groundwater seepage (into the basement) and stormwater
Treatment: none
Location: at the point of discharge from near the northeast corner of the facility (Latitude 29°43'30", Longitude 91°25'01")
Flow: 90 gpd
Discharge Route: local drainage thence to Big Oaks Bayou thence to the Intracoastal Waterway

Outfall 201

This outfall was a previous groundwater (compressor building floor drainage) and stormwater seepage outfall. The discharge from this outfall is now being pumped to Outfall 101 where it is being discharged.

Outfall 002

This outfall was a previous sanitary wastewater outfall. The facility is no longer discharging from this outfall; the sanitary wastewater is pumped out.

4. RECEIVING WATERS

STREAM - local drainage thence to Big Oaks Bayou thence to the Intracoastal Waterway

BASIN AND SEGMENT - Atchafalaya Basin, Segment 010601

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

There was an inspection at the facility on July 21, 2003. The findings were as follows: (1) no areas of concern were noted for the facility site review; (2) no areas of concern were noted for the receiving waters for Outfalls 001, 101, 201, and 002; (3) no discharge was occurring at the time of the inspection; (4) the sanitary system is shut down and locked; it does not discharge and is pumped out; (5) DMR's were reviewed for the various outfalls and the flow is not being estimated, the visible sheen was not being recorded, and there was one exceedance for BOD on Outfall 002 during the 1/1/02 through 12/31/02 monitoring period.

B. DMR Review/Excursions

DMR's were reviewed for the last two years. DMR's were submitted in accordance with the existing permit. There were no excursions found.

7. EXISTING EFFLUENT LIMITS

Outfalls 001 - stormwater runoff and compressor building floor drainage

Parameter	LWDPS	
	Daily Average	Daily Max
Flow - gpd	---	Report 1/quarter Est.
TOC	----	50 mg/L 1/quarter Grab
Oil and Grease	---	15 mg/L 1/quarter Grab
Visible Sheen	---	No Presence 1/day Observation

Outfalls 101 and 201 - stormwater runoff and compressor building floor drainage

Parameter	LWDPS	
	Daily Average	Daily Max
Flow - gpd	---	Report 1/quarter Est.
TOC	---	50 mg/L 1/quarter Grab
Oil and Grease	---	15 mg/L 1/quarter Grab

Outfall 002 - treated sanitary wastewater

Parameter	LWDPS	
	Daily Average	Daily Max
Flow - gpd	---	Report 1/6 months Est.
BOD	---	45 mg/L 1/6 months Grab
TSS	---	45 mg/L 1/6 months Grab
Fecal Coliform	---	400 col./100 mL 1/6 months Grab

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 010601 of the Atchafalaya Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Southern Natural Gas Company

1. Outfall 101 - groundwater seepage and stormwater (estimated flow is 90 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Daily Max (mg/l)	<u>Reference</u>
Flow	Report: Report	
TOC	---: 50 mg/L	Previous permit (BPJ)*
Oil and Grease	---: 15 mg/L	Previous permit (BPJ)*
pH	---: 6.0 - 9.0 s.u.	Previous permit (BPJ)*
Visible Sheen	---: No Presence	Previous permit (BPJ)*

Treatment: none

Monitoring Frequency: 1/day for visible sheen; 1/quarter for all other parameters at the point of discharge from near the northeast corner of the facility

Limits Justification: BPJ per the previous permit and similar discharges.

* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC33:IX.2511.B.14.k, stormwater discharges from facilities classified as SIC Code 4922 are not considered to be associated with industrial activities. Therefore, an SWP3 is not required for this facility.

303(d)/TMDL WATERBODIES

Subsegment 010601 is listed on LDEQ's Final 2004 303(d) List as impaired for chlorides, DO, sulfates, and total dissolved solids. To date no TMDL's have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDL's for the Atchafalaya Basin, those suspected causes for impairment which are not directly attributed to the natural gas processing point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment

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which could be attributed to pollutants which were not determined to be discharged at a level which would cause or have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. Therefore, for the purposes of this permit, the DO impairment will be addressed in a manner consistent with the Department's permitting guidance for implementing Louisiana's surface water quality standards as follows:

DO

To protect against the further impairment of the DO impairment cause, a TOC limit has been placed on Outfall 001.